

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

GILBERT JAMES, )  
Plaintiff, )  
v. )  
ENCORE CAPITAL GROUP, INC., ET ALS. )  
Defendants. )  
)

Civil Action No: 3:11cv221

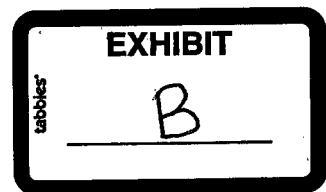
**PLAINTIFF'S OBJECTIONS TO MIDLAND CREDIT MANAGEMENT'S FIRST SET  
OF INTERROGATORIES**

COMES NOW, the Plaintiff, and as for his Objections to Defendant Midland Credit Management, Inc.'s (hereafter, "MCM") First Set of Interrogatories to Plaintiff, he states as follows:

**INTERROGATORY NO. 1**

Identify all persons with knowledge of any facts relating in any way to the allegations, averments, damages, denials, relief claimed, affirmative defenses and defenses concerning the Complaint, including as amended, the Answer, or any other issue in this matter, and for each such person identified, set forth his or her name, address and current telephone number as well as a detailed description of each person's knowledge relating to this action.

OBJECTION: No objection. (Plaintiff interprets this Interrogatory to request only the Plaintiff's own knowledge of what these persons have told him. He is not intending to answer on behalf of any third parties. If defendants intend otherwise, please advise Plaintiff's counsel immediately so that he may file a Motion for a Protective Order.)



will provide all facts that themselves constituted the actual violations alleged. If defendants intend otherwise, please advise Plaintiff's counsel immediately so that he may file a Motion for a Protective Order.)

**INTERROGATORY NO. 7**

Set forth each and every fact or application of law to fact to support your allegation that Defendants violated the Racketeer Influenced and Corrupt Organizations Act, including as alleged in your Complaint. Include in your response the specific subdivision(s) of 18 U.S.C. § 1961, et seq. that Defendants are alleged to have violated and all persons with knowledge of your contention.

OBJECTION: No objection. (Plaintiff does not interpret the request for "each and every fact" to literally demand a listing of every single fact that may come up or be offered at trial in the case. A contrary interpretation would demand the impossible. For example, the fact that the Plaintiff has a certain education level, or the fact that the Defendant's employee was trained on a certain day in a certain location by her supervisor to follow the procedures challenged in this case, could bear on whether or not particular conduct violated the law. Accordingly, Plaintiff will provide all facts that themselves constituted the actual violations alleged. If defendants intend otherwise, please advise Plaintiff's counsel immediately so that he may file a Motion for a Protective Order.)

**INTERROGATORY NO. 8**

Set forth each and every fact or application of law to fact to support your allegation that Defendants committed civil conspiracy, including as alleged in your Complaint. In your response, identify all persons with knowledge of your contention.